

Plaintiffs' Exhibit TT

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I want to begin by saying that the decision to come forward with this information has been a beyond difficult one. I have spent the past three years admiring Dr. Michael Noonan. He was the person who initially convinced me that Canisius College was the right place for me, and in the years since I have spent hours and hours with him as my mentor, confidante, and friend. I have travelled to 3 continents with him. I have learned more from him than I can even voice. However, I can no longer ignore the degrading and toxic environment he creates for myself, my friends, and other students he interacts with. Although I have witnessed and heard of endless inappropriate and harmful actions carried out by him directed towards other students, I have done my best to only include things that have happened directly to me. I also want to re-stress the importance of handling any actions against Dr. Noonan with the upmost care. He is a master manipulator. I realize I am probably preaching to the choir on this one. However, myself and the rest of the Project Tiger team are some of his closest confidantes. He considers us his most loyal and dedicated students, and if he finds out we have come forward he will see it as the ultimate betrayal and undoubtedly take malicious action against us. I do not wish to see him dragged through the mud, nor do I wish to discredit any of the good he has done in his years as an educator, but he is at the point where he should no longer be allowed in the presence of students.

Lack of Boundaries

- Has talked numerous times about his 30-year-old ex-girlfriend, who he still "frequents." This included him talking about telling his daughters about his relationship, and their reactions (this was in a group setting). He later asked me personally if this discussion made people uncomfortable. He took the girl in question on the CAC British Columbia trip (2017) and myself and other students witnessed an excess of flirting/touchiness.
- Has regularly spoken candidly to me about his relationship with the school administration and other ABEC professors.
- On the CAC Uganda (2018) trip, my roommate was constipated and neither of us had any laxatives. She finally got to the point where she felt the need

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to ask Dr. Noonan for a laxative and asked me to accompany her to his room to ask. When he answered the door and she told him the situation, he told me to go back downstairs because "We've got this." When my roommate came downstairs a few minutes later, she was laughing and told me that the laxative he gave her was a suppository. She then told me that he offered to "assist" her with it, saying "Some people have trouble with these. I can be a mature adult about this if you need help."

- On the Project Tiger trip, I brought laxatives because of my previous experience (see above). One of the girls on the trip was constipated and asked me if she could take some of my laxatives. Because she is my friend, and we are all adults, I said yes – no questions asked. Dr. Noonan later found this out and lectured me about needing his permission before interfering with anyone medically.

Culturally Incompetent

- Has used the word "transvestite" in my presence on numerous occasions.
- Dismisses anyone who cannot speak English by saying "you just don't understand"
- Interrupts constantly

Inappropriate Touching

- He hates when bra straps are showing and has physically moved/covered my bra straps on numerous occasions.
- Has touched/played with my hair without asking.
- Regularly physically moves me by grabbing my arms rather than asking me to move.
- He asked myself and another student to stretch his leg in our hotel room on the CAC Uganda Trip (2018)

Toxic Masculinity

- Has said "I own your bodies." And "You are not allowed to cut your hair or alter your body for the duration of this project." (Project Tiger)
- Has made me try on clothes and show them to him to get his "approval."